

1 DAYLE ELIESON
United States Attorney
2 DANIEL D. HOLLINGSWORTH
Assistant United States Attorney
3 Nevada State Bar No. 1925
501 Las Vegas Boulevard South, Suite 1100
4 Las Vegas, Nevada 89101
Telephone: (702) 388-6336
5 Facsimile: (702) 388-6787
Daniel.Hollingsworth@usdoj.gov
6 Counsel for the United States

7
8
9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA,) 2:16-CR-216-KJD-(VCF)
13)
Plaintiff,)
14)
v.) Bill of Particulars for Forfeiture of Property
15)
LONNY JOSEPH DITIRRO, JR.,)
16)
Defendant.)

17 The United States of America hereby files the following Bill of Particulars for Forfeiture
18 of Property.

19 This Bill of Particulars for Forfeiture of Property is a clarification of, and is more
20 specific than, the Forfeiture Allegation of the Superseding Criminal Indictment (ECF No. 80),
21 and the United States hereby gives notice to the defendant of this clarification and specificity
22 with this Bill of Particulars concerning the Forfeiture of the Property:

23 **FORFEITURE ALLEGATION**
24 **Sexual Exploitation of Children and Possession of Child Pornography**

25 1. The allegations contained in Counts One through Five of the Superseding Criminal
26 Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging

1 forfeiture pursuant to Title 18, United States Code, Section 2253(a)(1), 2253(a)(2), and
2 2253(a)(3).

3 2. Upon conviction of any of the felony offenses charged in Counts One through Five of
4 the Superseding Criminal Indictment,

5 **LONNY JOSEPH DITIRRO, JR.,**

6 defendant herein, shall forfeit to the United States of America, any visual depiction
7 described in Title 18, United States Code, Sections 2251 and 2252A, or any book, magazine,
8 periodical, film, videotape, or other matter which contains any such visual depiction, which was
9 produced, transported, mailed, shipped or received in violation of Title 18, United States Code,
10 Sections 2251(a) and 2252A(a)(5)(B):

11 defendant herein, shall forfeit to the United States of America, any property, real or
12 personal, constituting or traceable to gross profits or other proceeds obtained from violations of
13 Title 18, United States Code, Sections 2251(a) and 2252A(a)(5)(B):

14 defendant herein, shall forfeit to the United States of America, any property, real or
15 personal, used or intended to be used to commit or to promote the commission of Title 18,
16 United States Code, Sections 2251(a) and 2252A(a)(5)(B) or any property traceable to such
17 property:

18 SanDisk Micro Secure Digital Card (16GB) Ultra Plus.

19 All pursuant to Title 18, United States Code, Sections 2251(a), 2252A(a)(5)(B),
20 2253(a)(1), 2253(a)(2), and 2253(a)(3).

21 DATED this 9th day of May, 2018.

22 Respectfully submitted,

23 DAYLE ELIESON
24 United States Attorney

25 /s/ Daniel D. Hollingsworth
26 DANIEL D. HOLLINGSWORTH
Assistant United States Attorney

PROOF OF SERVICE

A copy of the foregoing was served upon counsel of record via Electronic Filing on May 9, 2018.

/s/ Priscila Matera Whalen
PRISCILA MATERA WHALEN
FSA Paralegal